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|--|--|---|
|  | <b>BCS Öko-Garantie GmbH</b><br><b>IR - Inspection Report EU / NOP / JAS</b> | <b>Wild Crops</b><br>Post-harvest Handling,<br>Storage and Export |
| Country: <b>Lesotho</b>  |  | Page: <b>1 / 16</b>   |
| QSYS Address-No: <b>17886</b>  |  | Date of Inspection//closing: <b>7-8 Nov 2017</b>                  |
| Client / Project: <b>The Rosehip co.</b>   |  | Name of Inspector: <b>R Peckover</b>                              |

### 1. Immediate reaction

|   |  |                              |  |
|---|--|------------------------------|--|
|  | Have serious problems been detected during the inspection that require immediate reaction? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| Total dimension of the project in ha: <b>1000000ha</b>                            |  |                              |  |

### 2. Inspection schedule

| Date                               | Location      | Activity / Inspected area   | Person(s) involved      |
|------------------------------------|---------------|---|-------------------------|
| 7 Nov 2017 04h15-08h00 08h00-09h30 | Maseru        | Drive to airport fly to Maseru.<br>Drive to Mhales Hoek   | R Peckover              |
| 09h30- 17h30                       | Mohale's Hoek | Drive to Mpaki in Quthing and to Mhales Hoek and Mafeteng to observe Rose Geranium and Pelargonium harvesting | H Nieuwoudt, R Peckover |
| 8 Nov 2017 08h00-16h00             | Mohale's Hoek | Bookkeeping , report writing  | H Nieuwoudt, R Peckover |


### 3. Company information

| <u>Address of the Company</u> (contract holder)                 |  | <u>Address of inspected site</u> (if not the company)           |                                      |
|---|--|---|--------------------------------------|
| Address where BCS will send the MC <input type="checkbox"/>     |  | Address where BCS will send the MC <input type="checkbox"/>     |                                      |
| Company Name:   | <b>The Rosehip Company (PTY) Ltd</b>     | Company Name:   | <b>The Rosehip Company (PTY) Ltd</b> |
| P.O Box (Street):   | <b>P O Box 3, Mohale's Hoek</b>          | P.O. Box /street:   | <b>P O Box 3, Mohale's Hoek</b>      |
| Zip Code / Town:  | <b>800</b>                               | Zip Code / Town:  | <b>800</b>                           |
| Province / State:   |  | Province / State:   |                                      |
| Country:  | <b>Lesotho</b>                           | Country:  | <b>Lesotho</b>                       |
| GPS No.:  | <b>30deg 08'46.12" S</b>                 | GPS No.:  |                                      |
| = geographical reference<br>e.g.: 49°27'30.86"N<br>11°5'41.20"E | <b>27deg 28'18.16" E</b>                 | = geographical reference<br>e.g.: 49°27'30.86"N<br>11°5'41.20"E |                                      |
| Contact Owner   |  | Contact Responsible person (if not the owner)                   |                                      |
| Name:   | <b>JH Nieuwoudt</b>                      | Name:   | <b>Same</b>                          |
| Phone:  | <b>+266 58889 157</b>                    | Phone:  |                                      |
| mobile:   | <b>+266 58889 157</b>                    | mobile:   |                                      |
| Fax:  |  | Fax:  |                                      |
| E-mail:   | <b>herman@the<br/>rosehipcompany.com</b> | E-mail:   |                                      |

|   |                            |
|---|----------------------------|
| Name and address of the company which carries out the most recent processing: | <b>All done here</b>       |
| Name and address of the exporter:   | <b>The Rosehip Company</b> |

### General information

|   |
|---|
| Describe briefly the history of the company, its relationship with BCS, its basic activities, changes since last year and other essential features: |
|---|

|   |  |  |   |
|---|--|--|---|
|  | <b>BCS Öko-Garantie GmbH</b><br><b>IR - Inspection Report EU / NOP / JAS</b> |  | <b>Wild Crops</b><br><b>Post-harvest Handling, Storage and Export</b> |
|   | Country: <b>Lesotho</b>  | Page: <b>2 / 16</b>                              |   |
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This project has been inspected for many years by BCS, and the actual flowering of the rosehip was observed in three areas of Quthing, Mohales Hoek and Mafeteng. There are now 8 areas for collection. All areas were indicated in Annex 2 of last years report and added again. This inspection therefore inspected the three sites as well as the processing of the rosehip which is at the end of the S African winter

The processing facility is situated at the small town of Mohale's Hoek. The collection is organised by the owner and all necessary permits etc are available. The Rosehip company is responsible for Rosehip and marketing thereof.

#### 4. Inspection according to the standard(s):

|  |                                     |                           |                                     |                                 |                          |                 |                          |
|--|-------------------------------------|---------------------------|-------------------------------------|---------------------------------|--------------------------|-----------------|--------------------------|
| <b>EU</b><br>(EU-Market)               | <input checked="" type="checkbox"/> | <b>NOP</b><br>(US-Market) | <input checked="" type="checkbox"/> | <b>JAS</b><br>(Japanese-Market) | <input type="checkbox"/> | <b>Other(s)</b> | <input type="checkbox"/> |
| Other national or private standard(s): |                                     |                           |                                     |                                 |                          |                 |                          |

#### 5. The following activities are covered by this inspection report

|                              |                                     |                              |                                     |                              |                          |                       |  |
|------------------------------|-------------------------------------|------------------------------|-------------------------------------|------------------------------|--------------------------|-----------------------|--|
| <b>Wild Crops Collection</b> | <input checked="" type="checkbox"/> | <b>Post-harvest Handling</b> | <input checked="" type="checkbox"/> | <b>Re-packing (acc. JAS)</b> | <input type="checkbox"/> | <b>Storage Export</b> | <input checked="" type="checkbox"/><br><input checked="" type="checkbox"/> |
| Short comment:               |                                     |                              |                                     |                              |                          |                       |  |

#### 6. Type of inspection

|  |                                     |  |                          |                               |                          |                       |                          |
|--|-------------------------------------|--|--------------------------|-------------------------------|--------------------------|-----------------------|--------------------------|
| <b>Yearly complete physical inspection</b> | <input checked="" type="checkbox"/> | <b>Additional announced inspection</b> | <input type="checkbox"/> | <b>Unannounced inspection</b> | <input type="checkbox"/> | <b>Pre-inspection</b> | <input type="checkbox"/> |
| Short comment:                             |                                     |  |                          |                               |                          |                       |                          |


#### 7. History of inspection

|   |  |                                       |                             |  |  |
|---|--|---------------------------------------|-----------------------------|--|--|
| <b>Is this the first inspection by BCS?</b> | Yes <input type="checkbox"/><br>No <input checked="" type="checkbox"/> | <b>Certified organic by BCS since</b> | <b>2008</b><br>month / year | <b>Previously certified organic by</b> |  |
| Short comment:                              |  |                                       |                             |  |  |

#### 8. Units located at other locations (not relevant )

|   |  |   |   |
|---|--|---|---|
| <b>Does the company use post-harvest units that are located at other locations?</b> | Yes <input type="checkbox"/><br>No <input checked="" type="checkbox"/> | <b>If YES, did the inspector visit these units?</b> | Yes <input type="checkbox"/><br>No <input type="checkbox"/> |
| <b>Does the company use export/sales units that are located at other locations?</b> | Yes <input type="checkbox"/><br>No <input checked="" type="checkbox"/> | <b>If YES, did the inspector visit these units?</b> | Yes <input type="checkbox"/><br>No <input type="checkbox"/> |
| If Yes, please describe locations and activities:                                   |  |   |   |

#### 9. Other units are ... (not relevant )

|  |  |                 |   |              |
|--|--|-----------------|---|--------------|
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|                                |                          |                 |                          |                          |                          |                |  |
|--------------------------------|--------------------------|-----------------|--------------------------|--------------------------|--------------------------|----------------|--|
| Owned by the inspected company | <input type="checkbox"/> | Sub-contractors | <input type="checkbox"/> | Others (please describe) | <input type="checkbox"/> | Place: GPS No. |  |
| Short comment:                 |                          |                 |                          |                          |                          |                |  |

### 10. Corrective measures from last inspection (not relevant )

| Non-conformity<br>Corrective measure | Dead-line | ..% fulfilled | ... in time?             |                          | Comment: |
|--------------------------------------|-----------|---------------|--------------------------|--------------------------|----------|
|                                      |           |               | YES                      | NO                       |          |
| none                                 |           | 100           | [x]                      | <input type="checkbox"/> |          |
|                                      |           |               | <input type="checkbox"/> | <input type="checkbox"/> |          |
|                                      |           |               | <input type="checkbox"/> | <input type="checkbox"/> |          |
|                                      |           |               | <input type="checkbox"/> | <input type="checkbox"/> |          |

### 11. Specific information regarding compliance with the organic standard(s)

| Reference  | No. | Question / Criteria   | Answer *) | verified by **) | Comment: (explanations, observations, etc.)                   |
|--|-----|---|-----------|-----------------|---|
| *) Please indicate in the "Answer" column: YES, NO, PART = partially, N/C = not checked - or N/R = not relevant<br>**) Please indicate in the "verified by" column the mode of how the criteria was inspected/checked: Vis = by visual check, Inter = by interviewing (conversation), Doc = by documentation. Please always comment in very few and short words. |     |   |           |                 |   |
| <b>A. Organic System Plan (OSP)</b>  |     |   |           |                 |   |
| 889: Art. 63 (1), (2)  | A.1 | Is the <u>OSP</u> in accordance with the actual conditions?   | Yes       | Doc             | Checked at inspection all aspects as seen                     |
|  | A.2 | Has the <u>OSP</u> been <u>updated</u> during inspection?   | No        | Doc             | No changes were made at inspection                            |
| 205.201<br>1830: II  | A.3 | Is the <u>list of collected wild crops species updated</u> and correct?                                   | Yes       | Doc             | Only the one species here Rosa eglanteria                     |
|  | A.4 | BCS will be <u>informed</u> about relevant changes by (date):   | Yes       | Doc             | If any changes are required , BCS will be informed beforehand |
| <b>JAS specific</b>  |     |   |           |                 |   |
| JAS Law 1830: II   | A.5 | Has the <u>name of the company/client or of a sub-unit changed</u> ?                                      | N/A       |                 |   |
|  |     | Has the <u>address of the company/client or of a sub-unit changed</u> ?                                   |           |                 |   |
|  |     | Has a <u>sub-unit changed</u> ? (cancelled or newly contracted)   |           |                 |   |
|  |     | In case of farmer groups: Has the <u>number of farmers changed</u> ? (If Yes: number before? number now?) |           |                 |   |
| <b>B. Collection area - general</b>  |     |   |           |                 |   |
| 834:   | B.1 | Is the <u>map of the collection area</u>  | Yes       | Doc             | This is on the map sent and attached 2 years ago              |



|                   |                 |                              |              |
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| Client / Project: | The Rosehip co. | Name of Inspector:           | R Peckover   |

| Reference  | No.  | Question / Criteria  | Answer *) | verified by **) | Comment: (explanations, observations, etc.)  |
|--|------|--|-----------|-----------------|--|
| Art.12, 2.<br>889:<br>Art.37,<br>70<br>205.202<br>205.207<br>1605:<br>Art.2, 4 |      | available (scale 1:25.000 to 1:50.000) and does it clearly identify the collection area and its surroundings?  |           |                 | with the three areas. This year the others are attached where collection takes place   |
|  | B.2  | Is it assured that <u>collection</u> is done only in <u>dedicated areas</u> ?  | Yes       | Doc             | According to collector list from the main five areas   |
|  | B.3  | Is it assured that the collection area is <u>NO nature protection area</u> ?   | Yes       | Vis             | Area visited by inspector in the Mphaki area for this inspection, see photos   |
|  | B.4  | In case of <u>privately owned areas</u> : has <u>written permission</u> been obtained to collect wild crops in this area (document available)?                                   | N/A       |                 | The areas are communal lands and permission is available to collect the Rose Hip which is an exotic and listed as a weed, attached for collection again last year from the Dept of Environment   |
|  | B.5  | In case of <u>state owned areas</u> , has <u>official permission</u> been obtained from competent authorities prior to collection?   | Yes       | Doc             | A permit is available for collection in the areas, this is an open permit and thus does not need renewal   |
|  | B.6  | Is it assured that <u>NO other companies collect</u> in the same area?   | No        | doc             | Rosa Canina also collect fruit there and were also Kiwa BCS certified  |
|  | B.7  | In case that <u>other companies collect</u> in the same area, is it assured that the total of <u>collected volumes</u> does not exceed the permitted quantities?                 | Yes       | Doc             | The amount available of fruit is around 3000tons but at most 2000tons could be harvested. It is planned to receive 1800t this coming year for processing. It should be noted that this plant is an exotic and a declared weed and the more seed removed from nature, the less the weed will spread. See the photo. |
|  | B.8  | Are documents available to prove that in the collection area <u>no prohibited substances have been used</u> during the last three years?   | Yes       | Doc             | Inspections have taken place over quite a few years and the people of Lesotho do not have money to buy conventional inputs, also the plants do not grow in worked fields but in steep slopes, along borders and streams, see photos  |
|  | B.9  | Is it assured that there are <u>NO big cities or industrial plants in the area</u> , or any other sources of pollution which may present a risk of contamination for wild crops? | Yes       | Vis             | No industrial area or town nearby  |
|  | B.10 | If NO, is it assured that collectors do not collect wild crops from those areas with <u>risk of contamination</u> ?  | N/A       |                 |  |
|  | B.11 | Is it assured that collectors do <u>not collect wild crops from conventional agricultural production sites</u> ?   | Yes       | Vis             | There is only some subsistence farming in the area and no signs of conventional farming was observed at inspection, the plants actually grow in the uncultivated areas above lands   |

**JAS specific**

|                             |      |   |     |  |  |
|-----------------------------|------|---|-----|--|--|
| 1605:<br>Art.4;<br>1830: II | B.12 | Have the existing <u>SOPs</u> regarding the collection area been implemented <u>accordingly</u> ?   | N/A |  |  |
| 1605:<br>Art.4              | B.13 | Does the collection area have <u>distinct, defined boundaries and buffer zones</u> to prevent the unintended contamination by prohibited substances from adjoining land managed conventionally? |     |  |  |

**C. Collected species / wild crops - general**

|   |     |  |     |          |   |
|---|-----|--|-----|----------|---|
| 834:<br>Art.12, 2.<br>205.207<br>1605:<br>Art.4 | C.1 | Is it assured that none of the collected wild crops are a <u>protected species</u> or that national law forbid their collection (national/international red list)? | Yes | Doc      | Rose Hip is a foreign exotic declared weed species brought into the area many years ago from Argentina. |
|   | C.2 | Are all collected wild crops species native of the region they grow in?  | No  |          | see above   |
|   | C.3 | Has the collected wild crops <u>never received any treatment</u> or handling (i.e. planting, pruning, fertilizing, etc.)?  | Yes | Doc/ Vis | None done to the shrub species, only fruit collection   |

**JAS specific**



|                   |                 |                              |              |
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| Reference             | No.  | Question / Criteria  | Answer *) | verified by **) | Comment: (explanations, observations, etc.) |
|-----------------------|------|--|-----------|-----------------|---|
| 1605: Art.4; 1830: II | C.4* | Have the existing <u>SOPs</u> regarding the wild crops to be collected been implemented accordingly? | N/A       |                 |   |

**D. Good collection practice and management - general**

|                                       |     |   |     |          |  |
|---------------------------------------|-----|---|-----|----------|--|
| 834: Art.12, 2. 205.207 1605 1830: II | D.1 | Is a management plan implemented for <u>good collection practice</u> , specifying the collection practices ensuring a long-term survival of collected species and their associated habitats?                                      | Yes | Vis, Doc | The rose Hip fruits are collected when ripe very carefully to avoid damage to the surrounding plants as well as to the environment, see the collection protocol of 2 years ago   |
|                                       | D.2 | Are all collectors informed about the <u>borders of the collection areas</u> ?  | Yes | Doc      | The collectors are only within the demarked area as in the map.  |
|                                       | D.3 | Are all <u>collectors trained</u> on good collection practice assuring the sustainability of the collection activities?   | Yes | Info     | The collectors are informed about how to collect without doing damage to the shrubs and environment. This training begins in January before the harvesting begins in March . Trainers are training collectors to ensure the environment is not damaged in the collection process.                          |
|                                       | D.4 | Are the <u>permitted collection quantities respected</u> (i.e. as permitted by state authorities)?  | N/A | Vis      | As all ripe fruit should be collected from this exotic weed this is N/A. The permit just states that this species can be harvested no quantities given.  |
|                                       | D.5 | Is it assured that <u>NO destructive collection methods</u> are used that threaten the reproductive potential of collected species (i.e. destruction of main roots, use of harvesting combs, etc.)?                               | Yes | Vis, Doc | Only ripe fruits with their seeds are harvested from the plants to ensure as much seed is removed from the environment as possible.  |
|                                       | D.6 | Are sufficient procedures in place to avoid mixing with <u>nonconforming products</u> or <u>contaminants</u> (e.g. re-used bags) during the collection (describe measures taken)?   | Yes | Vis      | Fruit collected by collectors into new plastic bags supplied by owner  |
|                                       | D.7 | Are appropriate <u>separation measures</u> in place to assure that no substitution, mixing or contamination with nonconforming products can occur during loading and transport of collected wild crops (describe measures taken)? | Yes | Doc      | Only the rose hip is collected into new bags, sealed and brought to the factory  |
|                                       | D.8 | During transport: Are the products always accompanied by <u>documents</u> and/or <u>labels</u> specifying the operator's name, name and organic status of the wild crop and the name of the certification body?                   | No  | Doc      | There is a label given at the processing factory with details for each bag, the bags are first collected at the collection points by workers from The Rose Hip Co. so they know where the rose Hip was collected. The lots are accompanied by the buying sheet which is signed by the collector on payment |

**JAS specific**

|                      |      |   |     |  |  |
|----------------------|------|---|-----|--|--|
| 1605: Art.4 1830: II | D.9* | Have the existing <u>SOPs</u> regarding collection rules and the management been implemented accordingly? | N/A |  |  |
|----------------------|------|---|-----|--|--|

**E. Post-harvest handling and storage - general**

|   |     |   |     |     |   |
|---|-----|---|-----|-----|---|
| 889: Art.31, 35 205.272 1605: Art.4; 1830: II | E.1 | Does the operator <u>contract sub-units</u> to handle the organic product within his own certification?   | No  |     |   |
|   | E.2 | Are organic products <u>stored in dedicated and identified storage places</u> , clearly separated from conventional or other non-conforming products or substances? (incl. products certified acc. to another organic standard) | Yes | Vis | Only organic products are stored on site in the locked storage area, The plastic bags used for the collection of the rosehip was seen at inspection to be in the new clean bags, given to collectors for collection purposes. |
|   | E.3 | Is the <u>cleaning of storage</u> implemented in a way that contamination of the stored products is avoided?  | Yes | Vis | There are no prohibited substances used and area is clean and free of any contamination.  |
|   | E.4 | Is only <u>pure/potable water without any additives</u> used for washing  | N/A | Vis | No water used for processing  |



|                   |                 |                              |              |
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| Reference | No. | Question / Criteria  | Answer *) | verified by **) | Comment: (explanations, observations, etc.)   |
|-----------|-----|--|-----------|-----------------|---|
|           |     | organic raw materials/organic products? In case additives are used please describe!                            |           |                 |   |
|           | E.5 | Is it assured that the washing water does NOT represent any risk of chemical or microbiological contamination? | Yes       | Vis             | Water , municipal is only used on the working surfaces, would be free of any harmful microbes                             |
|           | E.6 | Is the post-harvest handling /processing done by a subunit and is it covered by a separate report?             | No        | Vis             | The oil production is done on site , also the rose Hip hulls for tea and shells and the animal feed are all produced here |

**EU specific**

|                            |     |   |     |          |   |
|----------------------------|-----|---|-----|----------|---|
| 889: Art.31, 35, Anx. VIII | E.7 | Is the post-harvest handling done in compliance with the EU regulation? | Yes | Doc, Vis | This was checked at inspection and complies |
|----------------------------|-----|---|-----|----------|---|

**NOP specific**

|                    |      |   |     |          |  |
|--------------------|------|---|-----|----------|--|
| 205.270<br>205.605 | E.8  | Is the on-site post-harvest handling/processing done in compliance with NOP?  | Yes | Doc/ Vis | This was as required at inspection   |
| 205.271<br>205.606 | E.9  | Are procedures and practices for pest management designed to prevent infestation rather than to treat them?   | Yes | Vis      | Store is shut to prevent pests from entering   |
|                    | E.10 | Is facility pest management done only with materials/substances allowed by the NOP National List?   | Yes | Doc      | Insects are only flies and caught in traps, mice are caught and killed in electricuter traps |
|                    | E.11 | If synthetic substances are applied that are NOT on the National List: Are measures taken to prevent contact with organically produced products or ingredients? | N/A | Doc      | None are used  |

**JAS specific**

|                             |       |  |     |  |  |
|-----------------------------|-------|--|-----|--|--|
| 1830: I                     | E.12* | Are the facilities (buildings, machines, storage areas, etc.) sufficient for the handling of the JAS products?         | N/A |  |  |
| 1605: Art.4                 | E.13* | Is the on-site post-harvest treatment/processing done in full compliance with organic JAS?                             |     |  |  |
| 1605: Art.4;<br>1606: Tab.2 | E.14* | Is facility pest management implemented in compliance with organic JAS and are only allowed substances/materials used? |     |  |  |
| 1605: Art.4;<br>1830: II    | E.15* | Have the existing SOPs regarding post-harvest handling and/or storage been implemented accordingly?                    |     |  |  |

**F. Documentation / records - general**

|   |     |   |     |          |   |
|---|-----|---|-----|----------|---|
| 889: Art.66, 72<br>205.103<br>Subpart D<br>1830: II | F.1 | Are registers of incoming and outgoing products complete and coherent?  | Yes | Doc. Vis | The register was looked at of incoming fruit as well as the outgoing oils, shells and tea |
|   | F.2 | Do all documents (i.e. delivery notes, invoices, etc.) mention name of operator, product, reference to organic production and the certification body? | Yes | Doc      | This is for export products and has all details on.                                       |
|   | F.3 | Are the cleaning measures during post-harvest handling and storage documented?  | Yes | Doc      | There is a signed off cleaning questionnaire  |
| ISO 17065 #4.1.2.2j<br>1830: II                     | F.4 | Has the company established a complaint handling/management?  | Yes | Doc      | Owner is of management and handles these  |
|   | F.5 | If so: Are appropriate actions taken and are they documented - in case of a complaint?  | Yes | Doc      | There are actions documented  |

**EU specific**

|             |     |   |    |  |  |
|-------------|-----|---|----|--|--|
| 889: Art.86 | F.6 | Does the operator contract sub-units to handle the organic product within | No |  |  |
|-------------|-----|---|----|--|--|



|                   |                 |                              |              |
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| Reference | No. | Question / Criteria  | Answer *) | verified by **) | Comment: (explanations, observations, etc.) |
|-----------|-----|--|-----------|-----------------|---|
|           |     | his own certification?   |           |                 |   |
|           | F.7 | If <u>sub-units are contracted</u> by the operator: Are internal <u>contracts available</u> between the inspected operator and the sub-unit?                               |           |                 |   |
|           | F.8 | Do the <u>internal contracts</u> regulate at least the following:<br>- the sub-unit's obligation to meet the <u>requirements</u> of the relevant <u>organic standard</u> ? |           |                 |   |
|           |     | - the <u>exclusive marketing</u> of certified organic products <u>handled</u> by the sub-unit?   |           |                 |   |

**JAS specific**

|                      |  |   |     |  |  |
|----------------------|--|---|-----|--|--|
| JAS law 1830: II, IV | F.9*   | Have the existing <u>SOPs</u> regarding documentation been implemented accordingly?   | N/A |  |  |
|                      | F.10*  | Have the <u>form sheets</u> - indicated in the SOPs - been used properly?   |     |  |  |
|                      | F.11*  | Have the SOPs been reviewed according to the clients own regulations?   |     |  |  |
|                      | F.12*  | If SOPs were up-dated: Was the staff informed about the changes?  |     |  |  |
|                      | F.13*  | Is the <u>list/inventory of the devices</u> used for the organic production complete and updated?   |     |  |  |
|                      | F.14*  | Is the <u>JAS relevant documentation</u> filed properly?  |     |  |  |
| JAS law 1830: III, V | F.15   | <u>Production Manager</u> (PPMD) - incl. deputy, if relevant: Is she/he the same as the last year?<br>Please write her/his name(!)                    |     |  |  |
|                      | F.16*  | Are technical <u>qualification and/or practical experience</u> of the <u>production manager</u> - and the deputy - sufficient?                        |     |  |  |
|                      | F.17*  | Did the production manager - and the deputy - receive a JAS training?   |     |  |  |
|                      | F.18   | <u>Grading Manager</u> (GM): Is she/he the same as the last year?<br>Please write her/his name(!)   |     |  |  |
|                      | F.19*  | Are technical <u>qualification and/or practical experience</u> of the <u>Grading Manager</u> sufficient?  |     |  |  |
|                      | F.20*  | Did the grading manager receive a JAS training?   |     |  |  |
|                      | F.21*  | In case of a <u>Grading Team</u> : Is the staff the same as the last year?<br>Please write the name(s) of all members of the <u>grading staff</u> (!) |     |  |  |
|                      | F.22*  | Are technical <u>qualification and/or practical experience</u> of all members of the <u>grading staff</u> sufficient?                                 |     |  |  |
| F.23*                | Did all members of the grading staff receive a JAS training? |   |     |  |  |

**G. Traceability, Labelling and packaging - general**

|   |     |   |     |     |   |
|---|-----|---|-----|-----|---|
| 834:<br>Art.27,<br>13.<br>205.103<br>1830: IV | G.1 | Is a <u>traceability</u> system in place which documents status, quantity and origin of all products entering the unit(s) and also records status, quantity and buyers of the products leaving the unit(s)? | Yes | Doc | There is a record of incoming bags of rose hip, from where they originate as well as for the buyers.    |
| 889:<br>Art.31<br>205.309                     | G.2 | Are organic products <u>transported only in appropriate packaging</u> and in  | Yes | Vis | The tea is in sealed polypropylene bags, inners of polyethylene, labelled and sealed so no substitution |



|                   |                 |                              |              |
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| Reference                                | No. | Question / Criteria   | Answer *) | verified by **) | Comment: (explanations, observations, etc.) |
|--|-----|---|-----------|-----------------|---|
| 1605: Art.4                              |     | such a manner that substitution/mixing of the content is avoided?                                     |           |                 | can take place. Only clean new bags used    |
| Contractual Agreement for Using BCS Logo | G.3 | Does the operator use the BCS-Logo?   | Yes       | Doc             | This is used                                |
|  |     | If so: does the operator have a Contractual Agreement with BCS for using the BCS Logo?                | Yes       | Doc             | Contract is signed                          |
|  |     | If NOT: is a Contractual Agreement - filled out and signed by the operator - attached to this report? | N/A       |                 |   |

**EU specific**

|                                     |     |  |     |     |  |
|-------------------------------------|-----|--|-----|-----|--|
| 889: Art.31<br>58<br>271:<br>Art.1  | G.4 | Does the <u>label of the wild crops</u> leaving the unit or being transported to other units ( <i>non-retail container</i> ) contain the required information?             | Yes | Doc | The label, copy attached has all details on, see last years annex  |
| 889: Art.31,<br>58<br>271:<br>Art.1 | G.5 | In case first inspection, changed labeling requirements or change of the company's label: is a (new) label draft available and attached to this report?                    | N/A |     | Inspected for years  |
| 834: Art.27,<br>13.                 | G.6 | In case that the company buys and sells organic products is <u>traceability</u> assured so that <u>each outgoing product can be traced back to its supplier or origin?</u> | Yes | Doc | There are lists of the collectors from the supply forms, as well as the areas where these were collected from. |

**NOP specific**

|         |     |  |     |     |          |
|---------|-----|--|-----|-----|----------|
| 205.303 | G.7 | Does the <u>label/labelling of the wild crops</u> or products to be transported to other units ( <i>non-retail container</i> ) contain the required information? | Yes | Doc | As above |
| 205.303 | G.8 | In case first inspection, changed labeling requirements or change of the company's label: is a (new) label draft available and attached to this report?          | N/A |     |          |

**JAS specific**

|                                  |       |  |     |  |  |
|----------------------------------|-------|--|-----|--|--|
| JAS law 1830: IV<br>1971         | G.9*  | Is ( <i>or will it be</i> ) the <u>grading document</u> filled out completely and signed by the grading manager - every time a lot is ( <i>or will be</i> ) labelled with the JAS label? | N/A |  |  |
| JAS law; 1830: IV                | G.10* | Did ( <i>or will</i> ) the <u>grading manager</u> authorize the use of the JAS label only when the grading result was positive?  |     |  |  |
| JAS law 1605: Art.5              | G.11* | Does the <u>label/labelling of the wild crops</u> or products to be transported to other units or to be sold/exported contain the required information?                                  |     |  |  |
| JAS law; 1605: Art.5<br>1830: IV | G.12* | In case first inspection, changed labeling requirements or change of the company's label: is a (new) label draft available and attached to this report?                                  |     |  |  |

**H. Export and marketing/sales - general**

|                                |     |   |     |     |  |
|--------------------------------|-----|---|-----|-----|--|
| 889: Art.66<br>205.103<br>1830 | H.1 | Are organic products being <u>exported</u> by the company?  | Yes | Doc | Exports are undertaken                                   |
|                                | H.2 | Does the company <u>buy and sell</u> organic products from other companies?   | No  |     |  |
|                                | H.3 | Do the <u>records of incoming/out-going organic products</u> contain name of supplier/buyer, product, quantity and organic quality? | Yes | Doc | This was seen at inspection and includes all the details |
|                                | H.4 | Are <u>ALL organic certificates</u> of the suppliers valid and on file?   | N/A |     |  |





|                   |                 |                              |              |
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| Reference                          | No.  | Question / Criteria  | Answer *) | verified by **) | Comment: (explanations, observations, etc.)                                    |
|------------------------------------|------|--|-----------|-----------------|--|
|                                    | H.5  | Are documents related to organic commerce and handling marked as such and are they distinguishable from other documents?                                     | Yes       | Doc             | These are distinguishable as organic   |
|                                    | H.6  | Has a volume flow check - for each organic standard - been done and proved to be consistent?   | Yes       | Doc             | the processed product is traceable back to areas of collection                 |
|                                    | H.7  | In case of exports: is it assured that containers have NOT been treated with pesticides before loading?  | Yes       | Vis             | No pesticides are used in the processing area and also not in collection areas |
|                                    | H.8  | In case containers are treated or if not known: are organic products packed in such a way that contamination is prevented?                                   | N/A       | Vis             | Only new untreated containers are used   |
| <b>JAS specific</b>                |      |  |           |                 |  |
| JAS law; 1605: Art.4; 1830: II, IV | H.9  | Can the number and amount of JAS certified and labelled products be derived clearly from the operator's sales statistic?                                     | N/A       |                 |  |
| 1830 1833                          | H.10 | Does the company buy and sell JAS products from other companies, which are ready for final sale (Re-packing)?  |           |                 |  |
| JAS law                            | H.11 | Did the farmer/company prepare and submit a complete list of all JAS sales (1. April to 31. March of the following year) by 31 May - at the latest - to BCS? |           |                 |  |

## 12. Product flow (use attachments if necessary)

| Control of product flow refers to the period/time span *) - from:         |                | 1April 2017   |              | until:                                |                             | End Oct 2017                      |  |   |   |   |                            |                        |
|---|----------------|---------------|--------------|---------------------------------------|-----------------------------|-----------------------------------|--|---|---|---|----------------------------|------------------------|
| Product (please indicate the respective organic standard: EU, NOP or JAS) | (100%) organic | in transition | conventional | Quantity in stock at beginning (tons) | Harvested/ purchased (tons) | Conversion factor **)             | Finished product (tons)  | Quantity sold (tons)  | In stock now (tons)   | 1 + 4   | 5 + 6                      | Consistent? (YES / NO) |
|   |                |               |              | 1                                     | 2                           | 3                                 | 4  | 5   | 6   | 7   | 8                          |                        |
| Rose hip shells plus tea cut  | [x]            | [ ]           | [ ]          | 0                                     | 1800t wet fruits            | 35% loss in water for dried fruit | (Dried product 1170t dry whole rosehip) 526t shell, 117t hairs and sticks, 526t seed | 125tshells and 175t kg tea cut, 20t TBC high content seed (45% seed also 526t seed (In this last season 16t oil | 161t material in stock gives 36t shell Tea Bag cut 20t and 16t powder also 72t seed and | (Dried product 1170t dry whole rosehip ) 526t shell, 117t hairs and sticks, 526t seed | 1169 total product as in 4 | Y                      |



|                                   |   |
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| Product<br>(please indicate the<br>respective organic<br>standard:<br>EU, NOP or JAS) | (100%) organic           | in transition            | conventional             | Quantity in stock<br>at beginning (tons) | Harvested/<br>purchased (tons) | Conversion factor<br>(**) | Finished product<br>(tons) | Quantity sold<br>(tons)                         | In stock now<br>(tons) | 1 + 4 | 5 + 6 | Consistent?<br>(YES / NO) |
|---|--------------------------|--------------------------|--------------------------|--|--------------------------------|---------------------------|----------------------------|---|------------------------|-------|-------|---------------------------|
|   |                          |                          |                          | 1  | 2                              | 3                         | 4                          | 5   | 6                      | 7     | 8     |                           |
|   |                          |                          |                          |  |                                |                           |                            | was produced to date) and 45t powder hairs 117t | 16t hair               |       |       |                           |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |                                |                           |                            |   |                        |       |       |                           |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |                                |                           |                            |   |                        |       |       |                           |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |                                |                           |                            |   |                        |       |       |                           |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |                                |                           |                            |   |                        |       |       |                           |
|   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |  |                                |                           |                            |   |                        |       |       |                           |

\*) The product flow should be evaluated for the period since last inspection (or before last harvest) until the date of inspection - or for one crop year.

\*\*\*) In case the product is dried or otherwise processed, please indicate the conversion factor raw / processed.

**Comment - concerning product flow: The amount of shells and tea cut produced at 300t is what can be reached from the 1170t of fruit harvested and dried. For the oil for the past season, given as 16t in total to date and this was done since the last inspection.**

### 13. Certification for this year is requested for the following products and quantities

(Please refer to the attached plot/field list and use attachments if necessary)

| Product                                    | ha     | tons<br>(or other<br>unit ...) | EU Status<br>(organic) | NOP Status<br>(100% organic<br>or organic) | JAS Status<br>(organic) |
|--|--------|--------------------------------|------------------------|--|-------------------------|
| 1 Rose Hip oil                             | 550000 | 20t oil                        | org                    | 100% Org                                   |                         |
| 2 Rose Hip shells                          |        | 300t                           | org                    | 100% Org                                   |                         |
| 3 Rose Hip tea cut plus seed mixture       |        | 182.5t                         | org                    | 100% Org                                   |                         |
| 4 Animal feed from the rose hip processing |        | 500t                           | org                    | 100% Org                                   |                         |
| 5 Rose Hip seed                            |        | 526t                           | org                    | 100% Org                                   |                         |
| 6 Rose Hip powder                          |        | 44t                            | org                    | 100% Org                                   |                         |
| 7  |        |                                |                        |  |                         |



|                   |                 |                              |              |
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| Product | ha | tons<br>(or other<br>unit ...) | EU Status<br>(organic) | NOP Status<br>(100% organic<br>or organic) | JAS Status<br>(organic) |
|---------|----|--------------------------------|------------------------|--|-------------------------|
| 8       |    |                                |                        |  |                         |
| 9       |    |                                |                        |  |                         |
| 10      |    |                                |                        |  |                         |

14. Sampling (not relevant )


|  |  |
|--|--|
| Samples were taken for analyses from the following area(s)/collector(s):   |  |
| Please indicate which kind of sample(s) - or product(s) were taken:  |  |
| If there was a certain suspicion, please specify the pesticide or other substance for which samples should be tested/analysed: |  |

15. Deficiencies (missing documents, corrective measures, sanctions proposed, etc.)

Please also consider corrective measures from last inspection which were not 100%fulfilled (point 10.)

| Question<br>↓<br>IR ref. | Non-conformity     | EU<br>Reference | NOP<br>Reference | JAS<br>Reference | Deadline |
|--------------------------|--------------------|-----------------|------------------|------------------|----------|
|                          | Corrective measure |                 |                  |                  |          |
|                          | none               |                 |                  |                  |          |
|                          |                    |                 |                  |                  |          |
|                          |                    |                 |                  |                  |          |
|                          |                    |                 |                  |                  |          |
|                          |                    |                 |                  |                  |          |


16. Inspection result

|  |  |  |  |
|--|--|--|--|
|  | <b>BCS Öko-Garantie GmbH</b><br><b>IR - Inspection Report EU / NOP / JAS</b> |  | <b>Wild Crops</b><br><b>Post-harvest Handling,<br/> Storage and Export</b> |
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|  | Client / Project: <b>The Rosehip co.</b>                                     | Name of Inspector: <b>R Peckover</b>             |  |

| Recommendation for certification  | EU                                  | NOP                                 | JAS                      |
|---|-------------------------------------|-------------------------------------|--------------------------|
| The <u>wild crops collection fulfils all requirements</u> of the respective organic standard/regulation. Certification is recommended.  | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| There are <u>certain deficiencies</u> (see above). Nevertheless, certification is recommended and a certificate can be issued. Measures will/must be taken after issuing the certificate.           | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| There are <u>severe deficiencies</u> (see above). <u>Certification is not recommended straight away</u> . A certificate should not be issued before corrective measures have been implemented.      | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| There are <u>irregularities</u> (see above). Certification is recommended <u>only after the fulfilment</u> of the standard/regulation. This must be/has to be verified during a further inspection. | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |
| The wild crops collection does <u>not fulfil the organic standard/regulation</u> - and therefore <u>is not recommended for certification</u> .  | <input type="checkbox"/>            | <input type="checkbox"/>            | <input type="checkbox"/> |

## 17. Operators confirmation

|  |
|--|
| a) The client has witnessed the on-site inspection.  |
| b) The client agrees to fulfil the above defined corrective measures, conditions and /or sanctions. This includes possible changes during the following certification-process.   |
| c) The client has carefully checked the products to be certified and listed under point 13 - and confirms their correctness and completeness. The client is aware and accepts that any later amendment or change of the products may lead to a delayed certificate issuance and/or to additional costs. The same applies in case of products which are not conform with the BCS product list (e.g. special product names).   |
| d) The client has provided <u>all</u> certification-relevant documents - including those with signature, if required - according to the list under point 18 (Attachments to this inspection report).<br>The client has noted that in case of incomplete documentation, resp. delayed submission of missing documents, the inspection process will not be closed! At the moment of sending the missing information signed by the operator, the final closing of the inspection report will be proceeded and the respective closing date will be registered. From that date onwards, BCS will calculate the time needed for carrying out the certification which in turn might be in delay because of the late submission of the missing documents and as a result of those circumstances, BCS will not be able to extend the certificate in time. |
| e) Only at first JAS inspection:<br>The client confirms that a JAS training was conducted by the BCS inspector in the presence of the responsible persons (farmer/owner, production manager, Grading Manager, etc.). The details are given under point 20 (JAS Training) of this inspection report. All relevant aspects concerning the specific JAS requirements (e.g. grading of labeling, etc.) were presented, discussed and understood.   |

|  |  |  |   |
|--|--|--|---|
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| Client / Project: <b>The Rosehip co.</b>   |  |  |   |

**Mohale's Hoek**

Place

**8 Nov 2017**

Date

**R G Peckover**


BCS Inspector



**Mr J H Nieuwoudt**

Company's representative

|                     |   |
|---------------------|---|
| Note for inspector: | This <u>Inspection Report</u> (IR) must be completed per each company or project. Do not include independent sub-units in one report! |
|---------------------|---|

|  |  |  |   |
|--|--|--|---|
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|  | Client / Project: <b>The Rosehip co.</b>                                     | Name of Inspector: <b>R Peckover</b>             |   |

## 18. Attachments to this inspection report


Obligatory documents marked with "always" must be sent to BCS Germany; if indicated "If required" on request

| No. | Type of document   | Obligatory *)                                      | Attachment No. **)  |
|-----|--|--|---|
| 1   | <b>Application-form</b> : Are the dates complete and up-to-date?   | if required  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 2   | <b>Contract(s)</b> with BCS: Is the contract complete/ <i>signed</i> ?   | if required  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 3   | <b>OSP-Declaration-form</b> - if relevant/newly applied standard(s) incl. <i>signature</i> by client/responsible person(!)                             | <b>always</b>                                      | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 4   | <b>OSP</b> (Up-to-date) Organic System Plan incl. <i>signature</i> by client/responsible person(!)   | <b>always</b>                                      | NR <input type="checkbox"/> YES <input type="checkbox"/> No.: 1               |
| 5   | <b>Maps of collecting area</b> or a <b>Google map</b> with all the plots/collecting points   | <b>always</b>                                      | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 6   | <b>Drawing(s) of buildings</b> and units for post-harvest handling   | if required  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 7   | <b>Confirmation of non-use of forest pesticides</b> (for the past 3 years)   | <b>always</b>                                      | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 8   | <b>Permission for collection of wild crops</b> (for the year/season to be certified)   | if required  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:given previously |
| 9   | <b>Rules/Regulations on Good Collection Practice</b>   | <b>always</b>                                      | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:Sent previously  |
| 10  | <b>Sample</b> /copy of packing material, resp. <b>label</b> for finished products and export or transport label  | if required  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 11  | <b>Invoices for sale</b> (sample)  | if required  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.: 2               |
| 12  | <b>Copies of certificates and/or receipts</b> related to ingredients, additives, preservatives, disinfectants, etc., used during post-harvest handling | if required  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 13  | <b>10 Photos (max. 300 KB)</b> of the project.   | <b>always</b>                                      | NR <input type="checkbox"/> YES <input type="checkbox"/> No.: 3               |
| 14  | <b>Analysis results</b> - if applicable  | <b>always</b>                                      | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 15  | Only if <b>new JAS client</b> or <b>if changes(!)</b>  | <b>SOPs</b>  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 16  |  | <b>Grading document</b>                            | NR <input type="checkbox"/> YES <input type="checkbox"/> No.:                 |
| 17  |  | <b>JAS training documentation</b> (see next page!) | NR <input type="checkbox"/> YES <input type="checkbox"/> (IR - 21.)           |
| 18  | <b>Other documents: list of collectors</b>   | if required  | NR <input type="checkbox"/> YES <input type="checkbox"/> No.: 4               |

Comment:

\*) Please collect ALL obligatory attachments during inspection. Otherwise the inspection report cannot be accepted for certification!

\*\*) Please fill out: NR = not relevant; YES = if the document is attached; Number of attachment = e.g. "1"

|  |  |  |   |
|--|--|--|---|
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## 19. Time registration

| Time for inspection   | Time required in hours |              |
|---|------------------------|--------------|
| Travel Time (arrival and return journey) *  | <b>6.35 shared</b>     | Hours        |
| Inspection (EU/NOP/JAS) of operating site   | <b>3 shared</b>        | Hours        |
| Time required for preparation + report writing  | <b>5 shared</b>        | Hours        |
| Time for additional inspection - according to national standard                               |                        | Hours        |
| Time for additional inspection - according to private standard: BioSuisse, Naturland, Demeter |                        | Hours        |
| <b>TOTAL</b>  | <b>16.35</b>           | <b>Hours</b> |

\* max. 8 hrs. for each travelling-day: e.g.: arrival: 10 hrs. >> only 8 hrs. deductible + return: 7 hrs. >> 7 hrs. deductible = 15 hrs. total of travelttime

  
**R G Peckover**  
 BCS Inspector

**10 Nov 2017 Pretoria**  
 Date / Place

## 20. JAS Training (must be conducted and documented by the BCS inspector ➔ in case of new JAS client or changed responsible persons/personnel)

Note: Before the first JAS certification - ALL responsible persons (owner, re-packing manager, Quality Manager, Grading Manager) must participate in a JAS training(!) See Notification 1830, III. and V.

| Detail | Answer / Comment |
|--------|------------------|
|--------|------------------|



**BCS Öko-Garantie GmbH**  
**IR - Inspection Report EU / NOP / JAS**

**Wild Crops**  
 Post-harvest Handling,  
 Storage and Export

|                   |                 |                              |              |
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| Where did the training take place?                 |   |   |
|--|---|---|
| Who participated in the training?                  | Name  | Position / Function   |
|  |   |   |
|  |   |   |
|  |   |   |
|  |   |   |
|  |   |   |
| Topics of the training                             | Importance of the JAS system <input type="checkbox"/>                           | General JAS aspects <input type="checkbox"/>                      |
|  | Quality Manual / Standard Operational Procedures (SOP) <input type="checkbox"/> | Differences between EU/NOP/JAS <input type="checkbox"/>           |
|  | Grading and Grading Manager <input type="checkbox"/>                            | JAS label and labelling <input type="checkbox"/>                  |
|  | JAS-relevant documents and filing requirements <input type="checkbox"/>         | Report of grading results (sold amounts) <input type="checkbox"/> |
| Which media were used?                             | Kiwa BCS PowerPointPresentation <input type="checkbox"/>                        | Blackbord or flipchart <input type="checkbox"/>                   |
|  | Kiwa BCS informational documents <input type="checkbox"/>                       | Samples / other <input type="checkbox"/>                          |
| other aspects / observations / recommendations ... |   |   |